

SME:AB
F. #2023R00589

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

RAY BRITO,

Defendant.

Cr. No. 24-CR-00001

(T. 18, U.S.C., §§ 924(d)(1), 981(a)(1)(C),
2113(a) and 3551 et seq.; T. 21, U.S.C.,
§ 853(p); T. 28, U.S.C., § 2461(c))

Judge Kiyo A. Matsumoto

Magistrate Judge Vera M. Scanlon

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THE GRAND JURY CHARGES:

COUNT ONE
(Bank Robbery)

1. On or about June 14, 2023, within the Eastern District of New York and elsewhere, the defendant RAY BRITO did knowingly and intentionally take by force, violence and intimidation, from the person and presence of one or more employees of a bank, to wit: a branch of Citibank, located at 25-91 Steinway Street in Queens, New York, money belonging to and in the care, custody, control, management and possession of said bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

COUNT TWO
(Bank Robbery)

2. On or about September 22, 2023, within the Eastern District of New York and elsewhere, the defendant RAY BRITO did knowingly and intentionally take by force, violence and intimidation, from the person and presence of one or more employees of a bank, to wit: a branch of Santander Bank, located at 75-81 31st Avenue in Queens, New York, money

belonging to and in the care, custody, control, management and possession of said bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

(Title 18, United States Code, Sections 2113(a) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

3. The United States hereby gives notice to the defendant that, upon his conviction of either of the offenses charged herein, the government will seek forfeiture in accordance with: (a) Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offenses to forfeit any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offenses; and (b) Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any violation of any criminal law of the United States.

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Sections 924(d)(1) and 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL



FOREPERSON

By Ms. Kristin Mace, Assistant U.S. Attorney

BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

RAY BRITO,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 924(d)(1), 981(a)(1)(C), 2113(a), and 3551 et seq.; T.
21, U.S.C., § 853(p); T. 28, U.S.C., § 2461(c))

A true bill.

Foreperson

Filed in open court this _____ day,

of _____ A.D. 2023

Clerk

Bail, \$ _____

Arun Bodapati, Trial Attorney (718) 254-6250